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February 4, 2015

**VIA ECF**

The Honorable Justice Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square – Room 1106  
New York, NY 10007

**Re: Sea Trade Maritime Corp. v. Coutsodontis, et al. (Index No. 09 Civ. 488 (LGS) (HBP)),**  
**Request for Extension of Time to File Summary Judgment Responses**

Dear Judge Schofield:

We are counsel to Plaintiffs Sea Trade Maritime Corporation and George Peters in the above referenced action. We write to request a brief extension of time from February 9, 2015 until February 18, 2015 to file Plaintiffs' oppositions to Defendants' motions for summary judgment. The basis of our request is: (i) Judge Pitman's February 4, 2015 discovery conference to address outstanding discovery issues was postponed until February 11, 2015; (ii) our pending request to Judge Pitman to recommend a default judgment against Defendants Stelios Coutsodontis and Francesca Coutsodontis (the "Coutsodontis Defendants") for their willful failure to comply with their discovery obligations, or in the alternative, to order an adverse inference instruction; and (iii) the Coutsodontis Defendants' obligation to produce documents which are still outstanding and responsive to our document requests. As previously stated in our correspondence with this Court, these issues are crucial to Plaintiffs' responses to all Defendants' motions for summary judgment.

We understand that Judge Pitman's courtroom deputy, Mr. Bruce Hampton, has informed Your Honor about the circumstances surrounding the adjournment of today's discovery conference and the effect it could have on Plaintiffs' response papers. We are asking for February 18th as our response date due to the President's Day holiday and because that date is one week after Judge Pitman's scheduled February 11, 2015 conference.

This is Plaintiffs' third request for an extension of time on this matter. Defendants consent to this request.

Respectfully submitted,

*/s/ Jason H. Berland*  
Jason H. Berland  
Counsel for Plaintiffs